

Exhibit C

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

OCEANGATE INC.,

Plaintiff,

v.

DAVID LOCHRIDGE and CAROLE REID
LOCHRIDGE, and the marital community
composed thereof,

Defendants.

No. 18-2-05651-31

DECLARATION OF ALEX J. HIGGINS
IN SUPPORT OF DEFENDANTS'
NOTICE OF REMOVAL

I, ALEX J. HIGGINS, under penalty of perjury under the laws of the United States, declare that the following is true and correct:

1. I am over the age of 18, have personal knowledge of the matters set forth in this declaration, and am otherwise competent to testify. I am the sole attorney representing Defendants David Lochridge and Carole Reid Lochridge in this matter.
2. Prior to filing the Notice of Removal, I had an email exchange with Plaintiff's counsel, Thomas Gilman, wherein I asked if his client would be willing to stipulate that the amount in controversy did not exceed \$75,000. Mr. Gilman declined that invitation, reserving the right to pursue more than \$75,000 in damages exclusive of fees and costs.

DECLARATION OF ALEX J. HIGGINS - 1

LAW OFFICES OF ALEX J. HIGGINS
2200 Sixth Ave. Ste 500
Seattle, WA 98121
(206) 340-4856

- 1 3. The Complaint appears to allege serious breaches by the Defendants and either damage to
- 2 or failure to return expensive equipment used in submarines or other submersible vessels.
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- 5 4. The defendants in this matter, David Lochridge and Carole Reid Lochridge, live in the
- 6 State of Texas.
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- 10 5. Defendants were served with the summons and complaint for this matter on June 29,
- 11 2018, at their home in Texas.
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14 EXECUTED on this 24th day of July, 2018, at Seattle, Washington.

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20 /s/Alex J. Higgins

21 Alex J. Higgins
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